

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**SCANSOFT, INC.'S MOTION TO COMPEL FURTHER PRODUCTION OF  
DOCUMENTS AND RESPONSES TO INTERROGATORIES**

Plaintiff ScanSoft, Inc. (“ScanSoft”) hereby moves pursuant to Fed. R. Civ. P. 37 for an order compelling plaintiffs to (1) produce additional documents responsive to ScanSoft’s First Set of Document Requests and (2) provide further responses to ScanSoft’s First Set of Interrogatories. The grounds for this motion are set forth in the accompanying Memorandum.

Accordingly, it is respectfully requested that this motion be granted.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULE 7.1

I hereby certify that on May 20, 2005, counsel for the parties conferred by telephone in an effort to resolve the issues presented in this motion, and that the parties were unable to reach an agreement.

Dated: May 25, 2005

SCANSOFT, INC.,  
By its attorneys,

/s/ Rebecca L. Hanovice  
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